# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

UNITED STATES OF AMERICA. § ex rel. ALEX DOE, Relator, THE STATE OF TEXAS, ex rel. ALEX DOE, Relator, THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator, § § § § Plaintiffs, Civil Action No. 2-21-CV-022-Z v. § § PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., PLANNED 8888888 PARENTHOOD GULF COAST, INC., PLANNED PARENTHOOD OF GREATER TEXAS, INC., PLANNED PARENTHOOD SOUTH TEXAS, INC., PLANNED PARENTHOOD CAMERON COUNTY. INC., PLANNED PARENTHOOD SAN ANTONIO, INC., Defendants.

# STATE OF TEXAS'S MOTION TO WITHDRAW COUNSEL AND DESIGNATION OF ATTORNEY IN CHARGE

The State of Texas respectfully files this Motion to Withdraw Counsel and Designation of Attorney in Charge and in support, shows the following:

- 1. Current lead counsel of record is Raymond Charles Winter, formerly the Chief of the Civil Medicaid Fraud Division. However, Mr. Winter is no longer employed by the Attorney General's Office.
- 2. Christopher D. Hilton, Chief of the General Litigation Division, has been assigned as Attorney in Charge to represent the State of Texas in this cause. Mr.

Hilton is admitted to practice in the United States District for the Northern District of Texas and is a member in good standing of the State Bar of Texas. Mr. Hilton is familiar with this matter and prepared to assume the duties of lead counsel.

3. Amy Snow Hilton will remain as co-counsel for the State of Texas.

WHEREFORE, PREMISES CONSIDERED, the State of Texas respectfully requests that this Court permit Raymond Charles Winter to withdraw as Counsel of Record and to designate Christopher D. Hilton as Attorney in Charge for the State of Texas in the above-styled and numbered cause of action, and that he be served with all future correspondence and pleadings.

Dated: December 1, 2022

#### KEN PAXTON

Attorney General of Texas

### **BRENT WEBSTER**

First Assistant Attorney General

#### **GRANT DORFMAN**

Deputy First Assistant Attorney General

#### SHAWN E. COWLES

Deputy Attorney General for Civil Litigation

Respectfully submitted.

# /s/ Christopher D. Hilton

## CHRISTOPHER D. HILTON

Chief, General Litigation Division Texas Bar No. 24087727

#### **AMY SNOW HILTON**

Assistant Attorney General General Litigation Division Texas Bar No. 24097834

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ATTORNEYS FOR STATE OF TEXAS

# CERTIFICATE OF CONFERENCE

I certify that counsel for the State of Texas has conferred with all counsel of record and all counsel agrees to this motion.

<u>/s/ Christopher D. Hilton</u> CHRISTOPHER D. HILTON

# CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on December 1, 2022, causing electronic service on all counsel of record.

<u>/s/ Christopher D. Hilton</u> CHRISTOPHER D. HILTON